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A Limited Liability Partnership

2 Including Professional Corporations

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10 **UNITED STATES BANKRUPTCY COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

12 In re

13 INTERNATIONAL LONGSHORE AND
14 WAREHOUSE UNION,

15 Debtor.

Case No. 23-30662 HLB

Chapter 11 Proceeding

16 **STIPULATION TO CONTINUE**
17 **DEPOSITION DEADLINE AND OTHER**
18 **DATES IN CONNECTION WITH PLAN**
19 **CONFIRMATION PROCESS**

[No Hearing Required]

20 The Hon. Hannah L. Blumenstiel

1 TO THE HONORABLE HANNAH L. BLUMENSTIEL, UNITED STATES
2 BANKRUPTCY JUDGE, THE UNITED STATES TRUSTEE FOR REGION 17, MARK
3 SHARF, SUBCHAPTER V TRUSTEE, AND ALL OTHER PARTIES IN INTEREST:

4 This stipulation (“Stipulation”) is hereby entered into by and among International Longshore
5 and Warehouse Union, the above-captioned debtor and debtor in possession (the “Debtor”) in the
6 above-referenced chapter 11 case (this “Chapter 11 Case”), and ICTSI Oregon, Inc. (“ICTSI,” and
7 together with the Debtor, the “Parties”). In support of this Stipulation, the Parties refer to the
8 following recitals:

9 **RECITALS**

10 WHEREAS, on November 2, 2023, the Debtor filed its first amended *Plan of Reorganization*
11 *for Small Business Under Chapter 11* [Docket No. 60] (the “Plan”).

12 WHEREAS, on October 26, 2023, the Court entered an *Order Setting Schedule in*
13 *Connection with Plan Confirmation Process and Related Deadlines* [Docket No. 59]
14 (the “Scheduling Order”).

15 WHEREAS, on December 5, 2023, the Debtor filed its *Notice of (I) Agreement to Attend a*
16 *Mediation and (II) Proposed Amended Order Setting Schedule in Connection with Plan*
17 *Confirmation Process and Related Deadlines* [Docket No. 108] (the “Mediation Notice”).

18 WHEREAS, on December 6, 2023, the Court entered an *Amended Order Setting Schedule*
19 *in Connection with Plan Confirmation Process and Related Deadlines* [Docket No. 116]
20 (the “Amended Scheduling Order”). The Amended Scheduling Order established various deadlines
21 in connection with confirmation of the Plan, including setting (a) January 31, 2024 as the deadline
22 to complete depositions that were timely noticed and served in accordance with the Amended
23 Scheduling Order (the “Deposition Deadline”), (b) February 15, 2024 at 10:00 a.m. (Pacific Time)
24 as the date on which the Court will hold a pre-trial status conference in connection with confirmation
25 of the Plan (the “Pre-Trial Conference”), and (c) February 13, 2024 as the deadline for ICTSI and
26 all other parties in interest to file and serve written objections to the Plan (the “Plan Objection
27 Deadline”).

1 WHEREAS, the Parties have agreed, subject to the Court's approval, to continue the
2 Deposition Deadline, the Pre-Trial Conference, and the Plan Objection Deadline as set forth in this
3 Stipulation.

4 **ACCORDINGLY, AND SUBJECT TO THE COURT'S APPROVAL, IT IS HEREBY**
5 **STIPULATED THAT:**

- 6 1. The Deposition Deadline shall be continued to **February 9, 2024.**
7 2. The Pre-Trial Conference shall be continued to **February 22, 2024 at 10:00 a.m.**
8 **(Pacific Time).**
9 3. The Plan Objection Deadline solely with respect to ICTSI shall be continued to
10 **February 20, 2024.**
11 4. This Stipulation shall become effective upon approval by the Court.

12
13 Dated: December 21, 2023

14 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

15
16 By /s/ Ori Katz
17 ORI KATZ
18 GIANNA SEGRETTI
19 KORAY ERBASI
20 Attorneys for ICTSI Oregon, Inc.

21 Dated: December 21, 2023

22 PACHULSKI STANG ZIEHL & JONES LLP

23
24 By /s/ Jason H. Rosell
25 Debra I. Grassgreen
26 Jason H. Rosell
27 Counsel to the Debtor
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